

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler, District
Court Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

**[PROPOSED] ORDER
GRANTING CROSS MOTION
FOR PROTECTIVE ORDER**

THIS MATTER having come before the Court upon Plaintiffs' Motion to Compel the Production of Documents Withheld As Chinese State Secrets and the ZHP Parties' Cross Motion for Protective Order Precluding the Production of Documents Withheld as State, on notice to liaison counsel for Plaintiffs, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this _____ day of _____
2021, **ORDERED AND ADJUDGED** that Plaintiffs' Motion to Compel the Production of Documents Withheld as Chinese State Secrets is **DENIED IN FULL**;

IT IS FURTHER ORDERED that the ZHP Parties' Cross Motion for Protective Order Precluding the Production of Documents Withheld as Chinese State Secrets is **GRANTED IN FULL**.

Honorable Thomas I. Vanaskie,
Special Master